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DOCUMENT
ELECTRONICALLY FILED
DOC #:
DATE FILED: 4/20/16

April 18, 2016

VIA ECF

Honorable Debra Freeman
United States District Court
Southern District of New York
500 Pearl Street
New York, NY 10007

*The discovery deadline is
extended to 7/29/16, to enable
the parties to attempt to resolve
this action without incurring unnecessary
costs.*

SO ORDERED: DATE: 4/20/16

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DEBRA FREEMAN
UNITED STATES MAGISTRATE JUDGE

Re: Rosario v. Mis Hijos Deli Corp, et. al.,
15 CV 6049 (LTS)(DF)

MEMO ENDORSED

Dear Magistrate Judge Freeman:

Counsel submit this joint letter to the Court further to the telephonic conference held in this matter on April 11, 2016. During the telephonic conference the Court requested a status letter in advance of the Settlement Conference tentatively scheduled for June 2, 2016.

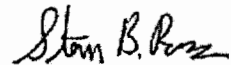
Counsel have had continued discussions relating to the settlement of this matter. Counsel agree that scheduling a settlement conference will be beneficial in attempting to resolve this matter without the need for trial. In advance of that settlement conference the parties shall continue to exchange documents. Defendants' counsel shall assess the documents provided by Defendants and advise Plaintiff's counsel in what way these documents contradict the allegations in the Complaint. Counsel have also discussed Plaintiff's outstanding demand for the metadata relating to the documents provided by Defendants. Defendants continue to work on gathering that information in the requested format.

In the event a settlement cannot be reached, counsel propose the following plan for how to proceed with this matter. Counsel have scheduled Plaintiff's deposition for July 11, 2016. Plaintiff has confirmed that he is available on that date. Counsel have scheduled the Defendants' depositions for July 25 and 26. Defendants' counsel has confirmed the availability of all

Defendants except Jose Palma, who currently resides in the Dominican Republic. Defendants' counsel will advise when they know that Jose Palma can appear for his deposition.

Counsel respectfully request that the Court extend the parties time to conduct discovery, including depositions to allow for the above schedule, and the scheduled Settlement Conference.

Respectfully,

A handwritten signature in black ink, appearing to read "Steven B. Ross". The signature is written in a cursive, flowing style.

STEVEN B. ROSS